| Project Stage | General Topic                    | Specific Metric(s)                                     | Analysis Already<br>Agreed To By<br>USAF? |
|---------------|----------------------------------|--|---|
| Pre-Baseline  |                                  |  |   |
|               | Monitoring Well<br>Installations |  |   |
|               |                                  |  |   |
|               |                                  |  |   |
|               |                                  |  |   |
|               |                                  | Continuous logging                                     | Y   |
|               |                                  | PID readings   | Υ   |
|               |                                  | LNAPL Dye Test; VOC and TPH if Dye<br>Test is Positive | Υ   |
|               |                                  | VOCs   | Υ   |
|               |                                  | TPH (DRO, GRO)   | Υ   |
| Baseline Data |                                  |  |   |

|   | Frequency of Analyses          | Location of Analyses        |
|---|--------------------------------|-----------------------------|
| Before baseline<br>geochemistry, field<br>data, and microbial<br>analyses performed | (Once - is an<br>installation) | (Location of Installations) |
|   | Once                           | CZ                          |
|   | Once                           | UWBZ                        |
|   | Once                           | LSZ                         |
| during well<br>installation   |                                | Following Table 5.1         |
| during well installation  |                                | Following Table 5.1         |
| during well<br>installation   |                                | Following Table 5.1         |
|   |                                | Following Table 5.1         |
|   |                                | Following Table 5.1         |

| Purpose   |
|---|
| These are additional wells to provide accurate monitoring of EBR                                    |
|   |
|   |
| These MWs are needed to ensure that there are sufficient data to evaluate the effectiveness of EBR. |
| The extraction wells can be used, but must be considered in   |
| separate groups and are not sufficient for this evaluation.   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
| To determine if benzene is slower to degrade than other aromatics (or faster, or average)           |

To provide one singular, synoptic round of data prior to inception of EBR

#### **Additional Comments**

MWs are needed in suitable locations to monitor the effectiveness of EBR. Otherwise, data evaluation will be much less meaningful. Accurate delineation of concentrations in downgradient portions of the site should also be emphasized relative to off-site migration potential, sulfate utilization, etc.

To the degree possible, wells should also be located so that aquifer heterogeneities (low-permeability zones) can be monitored and accurate spatial averages for parameter values can be computed.

New MWs must have time to equilibrate after installation and development before baseline field data, geochemistry, and microbial analyses are performed.

7 treatment "ovals" proposed, but only 3 ovals have monitoring wells that are in reasonable locations. Monitoring wells should be installed in locations between the injection and extraction wells to evaluate sulfate distribution and EBR progress (5/II/17 BCT slides, slide 25)

5 initial treatment "ovals" proposed; however, only one of the first 5 "ovals" where EBR is proposed for initial implementation has a monitoring well (ST012-UWBZ24). This well is not located in an optimal location for monitoring the effectiveness of treatment (i.e., it is not located on the path between the injection and extraction wells). Since these ovals are proposed for the initial injections, at least one monitoring well should be installed in each oval treatment area so that the injections and EBR progress can be monitored. There are 5 additional treatment "ovals," but there are no monitoring wells in these ovals; monitoring wells should be installed (5/11/17 BCT slides, slide 26)

15 treatment "ovals" proposed, but only 2 have monitoring wells in suitable locations. 3 additional "ovals" have monitoring wells located beyond the extraction well. Depending on how the extraction wells are pumped, sulfate may never reach these monitoring wells. Monitoring wells should be installed in locations that are suitable to monitor injections and EBR progress. The wells located beyond the extraction wells should also be monitored to evaluate sulfate distribution (5/11/17 BCT slides, slide 27)

Taken from Table 5.1, RD-RAWP Addendum 2 (March 2016)

Taken from Table 5.1, RD-RAWP Addendum 2 (March 2016)

Taken from Table 5.1, RD-RAWP Addendum 2 (March 2016)

Taken from Table 5.1, RD-RAWP Addendum 2 (March 2016)

Taken from Table 5.1, RD-RAWP Addendum 2 (March 2016)

These data, collectively, will help establish baseline criteria against which project progress and goals can be compared and monitored.

## **Hydrogeologic Data**

| Groundwater gauge data (depth to |  |
|----------------------------------|--|
| water, depth to product, product |  |
| thickness)                       |  |
| Perform Slug Tests               |  |

## **Mapping Contaminant Locations and Concentrations**

| Continue to locate and map LNAPL       | Υ |
|--|---|
| presence and depth                     |   |
| Monitor benzene content and            |   |
| concentration in LNAPL, where LNAPL is | Υ |
| found                                  |   |
| Continue to locate and map dissolved-  |   |
| phase benzene presence and             | Υ |
| concentration                          |   |
|  |   |
| Continue to locate and map dissolved-  |   |
| phase VOC presence and concentration   |   |
| Calculate total LNAPL mass present at  |   |
| start of EBR                           | Υ |
|  |   |
| Determine the content of COCs in the   |   |
| LNAPL at the start of EBR              |   |
|  |   |
|  |   |
|  |   |
| Locate and map sulfate concentrations  | Y |
| Locate and map sunate concentrations   | ' |
|  |   |

Modeling

| After SEE but before<br>EBR injections or<br>amendments | Once as baseline | New and existing MWs, located in the area to be impacted by injections/ amendments, and downgradient of this area |
|---|------------------|---|
|   |                  |   |
|   |                  | All New Wells and Existing Wells that have not been tested  |
| After SEE but before<br>EBR injections or<br>amendments | Once as baseline | New and existing MWs, located in the area to be impacted by injections/ amendments, and downgradient of this area |
|   |                  |   |
|   |                  |   |
|   | Monthly          | Perimeter wells   |
|   |                  |   |
|   |                  |   |
|   |                  | New and existing MWs with recoverable LNAPL   |
|   |                  | Targeted treatment area and downgradient portions of the site   |
| After SEE but before<br>EBR injections or<br>amendments | Once as baseline |   |

| For use in modeling  |
|--|
| Hydraulic Conductivity Measurement; for use in modeling  |
|  |
|  |
| Refer notes in "modeling" section of this table.   |
|  |
|  |
| Commenian of NADI commeniations before Iduning FDD to comme  |
| Comparison of NAPL compositions before/during EBR to assess reductions in COC content  |
| When compared to this baseline data, this information will help monitor for sulfate migration outside of the COC areas and facilitate comparison of EBR modeling results with field data |
|  |

| Data should be acquired for all three zones, including CZ   |
|---|
| Synoptic measurements should be made to allow accurate development of hydraulic head maps and evaluation of groundwater to produce gw flow directions   |
| Data should be acquired for all three zones, including CZ   |
| See modeling comments by Bo Stewart, 5/17   |
| Need to ensure good knowledge of locations where EBR treatments/amendments are being conducted, as well as downgradient   |
| Need to develop a good baseline of initial NAPL content at locations where EBR treatments/amendments are being conducted, as well as downgradient   |
| Report (graph) dissolved-phase trends over time, in addition to LNAPL trends for perimeter wells  |
|   |
| ADEQ transmitted extensive comments on the most recent AF mass and composition estimates of remaining NAPL on May 16.   |
| The existing characterization of NAPL composition is dated and displays a large deviation in a relatively small set of analyses. The most recent samples were collected from a NAPL holding tank. This NAPL was the combined recovery from the CZ, UWBZ and LSZ with unknown fractions from each. To allow a meaningful comparison of NAPL compositions before/during EBR to assess reductions in COC content, a large set of NAPL samples should be collected and analyzed separately from each zone and across each zone. |
|   |
|   |
|   |
|   |

Provide a time estimate for sufficient COCs depletion in LNAPL, groundwater, and soil

Provide details of EBR modeling to calculate time estimates for remediation

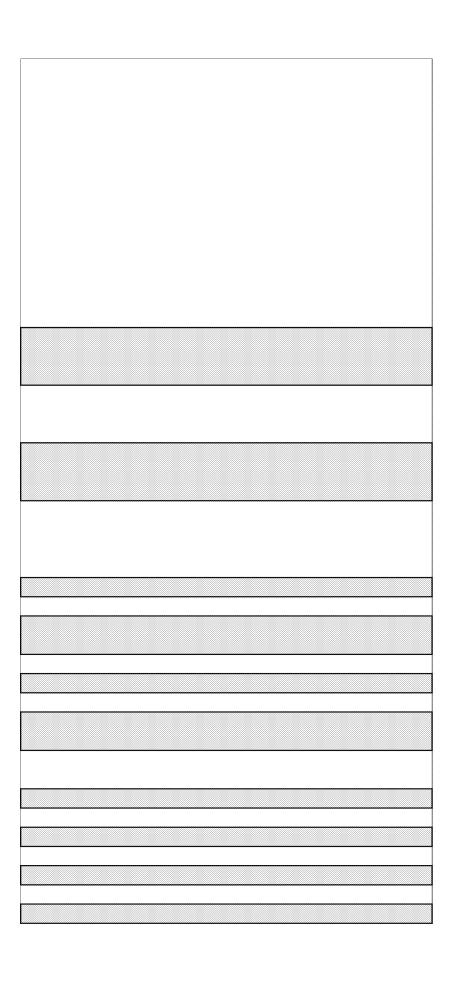
Provide proof of concept supporting the sulfate reduction for EBR

Provide details used to determine the optimal sulfate injection strategy.

### **GW Geochemistry**

| Temperature      | Υ |
|------------------|---|
| рН               | Υ |
| ORP value        | Υ |
| Dissolved Oxygen | Υ |
| Nitrate          | Υ |
| Phosphorus       |   |
| Ferrous Iron     |   |
| Total Iron       |   |
| Sulfate          | Υ |
| Hydrogen Sulfide |   |
| Methane          |   |
| Alkalinity       |   |
| TPH (DRO, GRO)   | Υ |
| VOCs             | Υ |
| Arsenic          | Υ |

| After SEE but before EBR injections or | Once as baseline | New and existing MWs, located in the area to be impacted by injections/ amendments, |
|--|------------------|---|
|  | Once as baseline | New and existing MWs, located in the area   |
| EBR injections or                      | Once as baseline | New and existing MWs, located in the area to be impacted by injections/ amendments, |



| The EBR modeling efforts conducted by the AF, while perhaps useful from an operational standpoint, do not provide a sufficiently extensive and detailed evaluation of important factors determining the efficacy and rate of COC biodegradation, and depletion of COCs from the LNAPL source materials. For instance, the AF EBR modeling efforts assume instantaneous mass transfer of COCs from the LNAPL to groundwater, which likely significantly over-estimates actual rates of transfer of COCs, therefore leading to over-estimates of rates of COC depletion from the LNAPL. In addition, the AF EBR modeling efforts assumed site-wide uniformity of critical parameters (such as porosity) [< They actually did use several different permeability zones in their model; I think we can leave this sentence out]. AF did not provide sensitivity analyses for evaluating the effect of these assumptions on remedial efficacy and timeframe scenarios. Therefore, the Regulatory Team has performed a detailed and extensive analysis and modeling effort to better capture the variability of physical, chemical and biological conditions across the site, and to show the range and likelihood of possible remedial efficacy and timeframe outcomes of EBR and MNA [ST12 Joint agency EBR model cover letter.pdf; TOR Estimates_ST012_052217.pdf; BIONAPL_Box_Model_revised_04-27-2017_UWBZ.xls]. |
|---|
| Modeling to date by the AF has not been sufficiently documented to allow an independent check on the results. The Regulatory Agencies technical team has sent a list of these deficiencies to AF.   |
| In particular, very little field data exists for the CZ and the UWBZ. The AF has not performed the EBR pilot test in the UWBZ that was agreed to in the ST012 Work Plan.  |
|   |
|   |
|   |
| Reported on AF flowchart as Eh  |
|   |
| AF decision flowchart only mentions "Iron" as an analyte, without differentiating which iron species will be monitored  |
| AF decision flowchart only mentions "Iron" as an analyte, without differentiating which iron species will be monitored  |
|   |
|   |
|   |
|   |

| Indigenous | Microbial | <b>Population</b> |
|------------|-----------|-------------------|
|------------|-----------|-------------------|

| Total size                              |   |
|---|---|
| Major groups within population, and     |   |
| their proportion of total               |   |
| Total size of sulfate-reducing bacteria |   |
| population                              | Υ |
| population.                             |   |
| Total size of benzene-degrading         |   |
| bacteria population                     |   |
| In-situ benzene degradation rate        |   |
|   |   |
| Amount of benzene converted to          | Υ |
| biomass during stable isotope study     |   |
| Amount of benzene converted to          |   |
| carbon dioxide during stable isotope    | Y |
| study                                   |   |
| The overall health of the indigenous    |   |
| microbial population, as determined via |   |
| PLFA analyses                           |   |
| The dominant electron-accepting         |   |
| process for indigenous microbial        |   |
| population, and reason for the          |   |
| conclusion                              |   |

#### Assessments During EBR

### **Hydrogeologic Data**

Groundwater gauge data (depth to water, depth to product, product thickness)

Biofouling

Y

**Mapping Contaminant Locations and Concentrations** 

| After SEE but before<br>EBR injections or<br>amendments | Once to establish<br>baseline | Samplers should be placed so as to monitor the core of sulfate injections, its periphery, and downgradient.  All three zones should be monitored.  The same wells should be monitored pre-EBR, during EBR, and post-EBR. |
|---|-------------------------------|--|
|   |                               |  |
|   |                               |  |
|   |                               |  |
|   |                               |  |
|   |                               |  |
|   |                               |  |
|   |                               |  |
|   |                               |  |
|   |                               |  |
|   |                               |  |
|   |                               | New and existing MWs, located in the area to be impacted by injections/ amendments, and downgradient of this area  |
|   | quarterly                     |  |
|   |                               |  |
| During EBR  |                               | All new and existing MWs, located in the area to be impacted by injections/ amendments, and downgradient of this area  |

| hese ass | essments v                | vill be use | d to moni | itor the p | rogress | of.  |  |
|----------|---------------------------|-------------|-----------|------------|---------|------|--|
|          | to determir<br>These will |             |           |            |         | d to |  |
|          |                           |             |           |            |         |      |  |
|          |                           |             |           |            |         |      |  |
|          |                           |             |           |            |         |      |  |
|          |                           |             |           |            |         |      |  |

| These sample                                 |           |  |  |           |         |       |          |       |      |      |       |      |        |     |  |
|--|-----------|--|--|-----------|---------|-------|----------|-------|------|------|-------|------|--------|-----|--|
| qPCR perforn<br>Insights uses<br>flowchart.  |           |  |  |           |         |       |          |       |      |      |       |      |        | ial |  |
|  |           |  |  |           |         |       |          |       |      |      |       |      |        |     |  |
|  |           |  |  |           |         |       |          |       |      |      |       |      |        |     |  |
|  |           |  |  |           |         |       |          |       |      |      |       |      |        |     |  |
| Synoptic mea<br>groundwater<br>See AF Decisi | to produc |  |  | <br>te de | evelopm | ent o | of hydra | aulic | head | maps | s and | eval | uation | of  |  |

|   |               | Locate and map LNAPL presence and depth - monitoring wells                                   | у |
|---|---------------|--|---|
|   |               | Locate and map dissolved-phase benzene presence and concentration                            | у |
|   |               | Locate and map dissolved-phase VOC presence and concentration                                | У |
|   |               | Calculate total LNAPL mass   |   |
|   |               | Determine the content of COCs in the LNAPL   |   |
|   |               | Locate and map sulfate concentrations in the targeted treatment area as well as downgradient | Y |
|   | Modeling      |  |   |
| copy comment from<br>pre EBR section ???? |               | Provide a time estimate for sufficient COCs depletion in LNAPL, groundwater, and soil        |   |
|   |               | Provide details of EBR modeling to calculate time estimates for remediation                  |   |
|   |               | Provide proof of concept supporting the sulfate reduction for EBR                            |   |
|   |               | Provide details used to determine the optimal sulfate injection strategy.                    |   |
|   | GW Geochemist | try  |   |
|   |               | Temperature pH ORP value   | Y |
|   |               | Dissolved Oxygen   | Y |

|            | Timing of sampling and analysis to follow schedule outlined in Table 4.1 of referenced document; mapping performed once per month  Quarterly  Quarterly | MWs with recoverable NAPL located in the area to be impacted by injections/ |
|------------|---|---|
|            | Quarterry   | amendments  |
| During EBR | At least annually   |   |
| During EBN | At least aimually   |   |
|            |   |   |
|            |   |   |
|            |   |   |
|            |   |   |
|            |   |   |
|            |   |   |
|            |   |   |
|            |   |   |
|            |   |   |
|            |   |   |
|            |   |   |
|            | Monthly for the first   |   |
| During EBR | quarter of EBR, followed by quarterly   | New and existing MWs  |
|            |   |   |
|            |   |   |
|            |   |   |

|   | on of NAPL<br>s in COC co  | . composition  | ns before/d   | luring EBR t   | o assess   |   |
|---|--|--|---|--|--|---|
|   |  |  |   |  |  |   |
| benzene of<br>Modeling<br>geochemic<br>paramete<br>biodegrad<br>mechanis<br>of LNAPL<br>other hyd<br>due to slo<br>calculatio<br>performe | concentrati<br>and analystical (e.g., su<br>ers that sup<br>dation med<br>ms). Mode<br>constituent<br>drocarbon co<br>w NAPL/ac<br>ns in "Figur<br>d to rigoro | ement of rerection reductionses of field dealers and medianisms (separations of the concentrations queous-phases tab). Separation of EBR | ns in LNAPL ata should a nicrobial day arbon mine parate from o evaluate in e extent to vertice mass transitivity and int the varia | and ground<br>also incorpo<br>ta (e.g., biod<br>ralization by<br>dilution or<br>rate-limited<br>which benze<br>s in ground<br>asfer (refer the<br>alyses shoul<br>ability of rer | lwater.  brate  mass)  sorption  dissolution  ene and  water are to example  d also be | n |
|   |  |  |   |  |  |   |
|   |  |  |   |  |  |   |
|   |  |  |   |  |  |   |
|   |  |  |   |  |  |   |

| Need to ensure good knowledge of locations where EBR treatments/amendments are being conducted, as well as downgradient. Timing schedule found in: Final Field Variance Memorandum #5 – Extraction and Treatment System Construction, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona; 01 Dec 2016  |
|---|
| Measurements of NAPL content, specifically benzene mole fraction, are a primary parameter for assessing EBR performance. See the "Figures" tab for example plots of benzene mole fraction. Refer to other comments in "modeling" sections of this table.  |
| When compared to this baseline data, this information will help monitor sulfate migration outside of the COC areas  |
| The EBR modeling efforts conducted by the AF, while perhaps useful from an operational standpoint, do not provide a sufficiently extensive and detailed evaluation of important factors determining the efficacy and rate of COC biodegradation, and depletion of COCs from the LNAPL source materials. For instance, the AF EBR modeling efforts assume instantaneous mass transfer of COCs from the LNAPL to groundwater, which likely significantly over-estimates actual rates of transfer of COCs, therefore leading to over-estimates of rates of COC depletion from the LNAPL. In addition, the AF EBR modeling efforts assumed site-wide uniformity of critical parameters (such as porosity) [< They actually did use several different permeability zones in their model; I think we can leave this sentence out]. AF did not provide sensitivity analyses for evaluating the effect of these assumptions on remedial efficacy and timeframe scenarios. Therefore, the Regulatory Team has performed a detailed and extensive analysis and modeling effort to better capture the variability of physical, chemical and biological conditions across the site, and to show the range and likelihood of possible remedial efficacy and timeframe outcomes of EBR and MNA [ST12 Joint agency EBR model cover letter.pdf; TOR Estimates_ST012_052217.pdf; BIONAPL_Box_Model_revised_04-27-2017_UWBZ.xls]. |
| Ongoing updates as field data become available. Modeling to date by the AF has not been sufficiently documented to allow an independent check on the results. The Regulatory Agencies technical team has sent a list of these deficiencies to AF.   |
| Ongoing updates as field data become available  |
| These analyses will provide an indirect method of monitoring the indigenous microbial community.  |
|   |
| Reported on AF flowchart as Eh  |
|   |

|               | Nitrate Y  |
|---------------|--|
|               | Phosphorus   |
|               | Ferrous Iron   |
|               | Total Iron   |
|               | Sulfate Y  |
|               | Hydrogen Sulfide   |
|               | Methane  |
|               | Alkalinity   |
|               | TPH (DRO, GRO) Y VOCs Y  |
|               | Arsenic Y  |
| TEA Injection | Fluid  |
|               | ICP Metals Y   |
|               | Details of injection material                                  |
|               | composition  |
|               | Sulfate Y  |
|               | Location of each injection/amendment                           |
|               | Concentration of sulfate at each injection/ amendment location |
|               | Anticipated zone of influence for each                         |
|               | injection/ amendment   |
| Indigenous M  | icrobial Population  |
|               |  |
|               | Total size   |
|               | Major groups within population, and their proportion of total  |
|               | Total size of sulfate-reducing bacteria  population            |

| During EBR, for every injection/         |  |   |
|--|--|---|
| amendment event                          |  |   |
| and location                             |  |   |
|  |  |   |
|  | Monthly, per Table 5.1<br>Need to check each |   |
|  | batch  |   |
|  |  |   |
|  |  |   |
|  |  | Samplers should be placed so as to monitor                                |
|  | At least once during EBR, 4-6 weeks after    | the core of sulfate injections, its periphery,                            |
| During EBR, 6-9<br>months post-injection | initial sulfate injection.<br>May need to be | and downgradient.   |
| (per Decision Matrix)                    | repeated if geochem data suggests a          | All three zones should be monitored.                                      |
|  | problem.                                     | The same wells should be monitored pre-<br>EBR, during EBR, and post-EBR. |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |

| To help monitor key microbial nutrient availability   |
|---|
|   |
| Will help determine preferred TEA for indigenous microbes   |
| · · · · · · · · · · · · · · · · · · ·   |
| NAVIII halm datawasina musfawa d TEA famin dinamana maisuahaa   |
| Will help determine preferred TEA for indigenous microbes   |
| To monitor if periodic sulfate injections or recirculation are  |
| necessary to sustain degradation rates  |
|   |
| To monitor if hydrogen sulfide concentrations inhibit degradation or  |
| will subsurface conditions mitigate their buildup?  |
| will subsulface conditions infugate their buildup:  |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
| To record makeup and concentration of injection fluid   |
| ,   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
| Millaha inia ahada difaha kasasasa wall diaheka kada dibbana asab ka  |
| Will the injected sulfate become well distributed with respect to   |
| NAPL accumulations?   |
|   |
| These analyses will quantify the size, makeup, and health of the  |
| indigenous microbial community.   |
|   |
| If the new constitutions the state and successful to the state of the |
| If there are indications that the microbial population is struggling  |
| during EBR, the analyses should be repeated to determine if   |
| alternate strategies are needed   |
| -   |
|   |
|   |
|   |
|   |
| May also help determine lag time for SPPs to asslimate to clausted  |
| May also help determine lag time for SRBs to acclimate to elevated  |
| sulfate concentrations and determine if highly concentrated   |
| · · · · · · · · · · · · · · · · · · ·   |
| injections of sulfate will be inhibitive to bacterial activity  |

| AF decision flowchart only mentions "Iron" as an analyte, without differentiating which iron species will be monitored   |
|--|
| AF decision flowchart only mentions "Iron" as an analyte, without differentiating which iron species will be monitored   |
|  |
|  |
|  |
|  |
|  |
| Taken from Table 5.1, RD-RAWP Addendum 2 (March 2016); This data will provide a record of exactly what was   |
| injected, where, and at what concentration. This, when compared with the response by the contaminants and other geochemical and biological data, will help determine if any changes need to be made to amendment variables such as frequency, concentration, etc.  |
| Any metals over MCL would prevent ability to inject  |
| This may be proprietary; however, an effort to obtain this information should be made  |
| Need to check the TEA fluid before injection <del>fluid before goes into ground</del> to ensure that the concentration is as expected, was mixed and diluted correctly, etc.   |
|  |
|  |
|  |
| All items other than the last metric, and using qPCR to determine the size of the sulfate-reducing population, are included as part of the already-proposed standard stable-isotope probe (SIP; Bio-Trap) study listed on the AF decision flowchart, but are not included in the metrics to be reported. All of these data are key to fully understanding the makeup, activities, and health of the indigenous microbial population. |
| These samplers cannot be used in LNAPL, but can be deployed underneath LNAPL.  |
|  |
|  |
| Taken from Table 5.1, RD-RAWP Addendum 2 (March 2016). AF decision flowchart references SRB gene, but Microbial Insights uses the APS gene to screen for sulfate reducers. Unclear as to what "SRB" gene is being referenced in  |

|               | Total size of benzene-degrading bacteria population  |         |
|---------------|--|---------|
|               | In-situ benzene degradation rate   |         |
|               | Amount of benzene converted to biomass during stable isotope study   | Υ       |
|               | Amount of benzene converted to carbon dioxide during stable isotope study                                  | Υ       |
|               | The overall health of the indigenous microbial population, as determined via PLFA analyses                 |         |
|               | The dominant electron-accepting process for indigenous microbial population, and reason for the conclusion |         |
|               |  |         |
|               |  |         |
|               |  |         |
|               |  |         |
|               |  |         |
|               |  |         |
| Post-EBR Data |  |         |
|               |  |         |
|               |  |         |
|               |  |         |
|               |  |         |
| Hydrogeologi  | c Data   |         |
|               | Groundwater gauge data (depth to water, depth to product, product thickness)                               |         |
|               | Biofouling   | Υ       |
| B.4           | Annaturant Laurette de la 1000 de  |         |
| Mapping Con   | taminant Locations and Concent   | rations |
|               | Locate and map LNAPL presence and depth  |         |

| Post-EBR |   | Each MW used for injections, amendments, or any analyses |
|----------|---|--|
|          | Minimum of semi-<br>annual  |  |
| Post-EBR | once Quarterly, then frequency amended per modeling and EPA guidance on MNA | Each MW used for injections, amendments, or any analyses |
|          |   |  |

| This data will<br>during EBR, to<br>identify nece<br>baseline infol | o determine<br>ssary future a                 | the success<br>actions. Th | of the proje<br>is data will a | ect as well a | is to |
|---|---|----------------------------|--------------------------------|---------------|-------|
| during EBR, to<br>identify neces                                    | o determine<br>ssary future a                 | the success<br>actions. Th | of the proje<br>is data will a | ect as well a | is to |
| during EBR, to<br>identify neces                                    | o determine<br>ssary future a                 | the success<br>actions. Th | of the proje<br>is data will a | ect as well a | is to |
| during EBR, to identify neces                                       | o determine<br>ssary future a                 | the success<br>actions. Th | of the proje<br>is data will a | ect as well a | is to |
| during EBR, to identify neces                                       | o determine<br>ssary future a                 | the success<br>actions. Th | of the proje<br>is data will a | ect as well a | is to |
| during EBR, to<br>identify neces                                    | o determine<br>ssary future a<br>rmation used | the success<br>actions. Th | of the proje<br>is data will a | ect as well a | is to |
| during EBR, to<br>identify neces<br>baseline info                   | o determine<br>ssary future a<br>rmation used | the success<br>actions. Th | of the proje<br>is data will a | ect as well a | is to |

| EBR rem                            | edial goals i   | include:                              |                                       |  |                                     |                         |                        |                                  |                     |                     |                     |                                 |                  |     |
|------------------------------------|---|---------------------------------------|---------------------------------------|--|-------------------------------------|-------------------------|------------------------|----------------------------------|---------------------|---------------------|---------------------|---------------------------------|------------------|-----|
|                                    | tion of COC<br>annot transf   |                                       |                                       |  |                                     |                         |                        |                                  |                     | e that t            | he CO               | C-depl                          | eted             |     |
| could be<br>within th<br>of the aq | ition of aque<br>expected (l<br>ne ROD rem<br>queous-phas<br>u of mass ou | pased on I<br>edial time<br>se benzen | Regulator<br>eframe. [<br>le mass, is | y Agency r<br>< I added '<br>sorbed to | n <mark>odelinլ</mark><br>'soil" be | g) to redu<br>cause mo  | ce COCs i<br>st of the | i <mark>n on- a</mark><br>aqueou | nd off-s<br>is-phas | site gro<br>a SVOC  | undwa<br>mass,      | i <mark>ter be</mark><br>and al | low MC<br>most h | alf |
| on- and o                          | numerical m<br>off-site, alor<br>entation of E<br>s, evaluate s           | ng with as<br>EBR, and o              | sociated (<br>of MNA) w               | geochemic<br>vill be deve              | al and n<br>loped b                 | nicrobiold<br>ased on F | gical dat<br>egulator  | a, at sp<br>y Ageno              | ecific ti<br>cy mod | nes aft<br>eling ef | er initi<br>forts t | al                              |                  |     |
|                                    | measurem<br>ater <del>to pro</del>  |                                       |                                       |  | accurat                             | e develor               | ment of                | hydrau                           | ic heac             | l maps              | and ev              | aluatio                         | m of             |     |
|                                    |   |                                       |                                       |  |                                     |                         |                        |                                  |                     |                     |                     |                                 |                  |     |
| Performa                           | aniel F., Stev<br>ance Monito<br>n Laboratory                             | oring of M                            | 1NA Reme                              | edies for V                            | OCs in G                            | round Wa                | iter EPA/              | 600/R-                           | 04/027              | , Natior            | nal Risl            | k Mana                          | gemen            | nt  |

| Modeling      | Locate and map dissolved-phase benzene presence and concentration, in excess of 5 ug/L  Locate and map dissolved-phase VOC presence and concentration  Calculate total LNAPL mass present  Determine the content of COCs in the LNAPL  Locate and map sulfate concentrations in the targeted treatment area as well as downgradient  Provide a time estimate for sufficient COCs depletion in LNAPL, groundwater, |
|---------------|---|
| GW Geochemist | and soil by MNA  Provide details of post-EBR modeling to calculate time estimates for remediation  Ty  Temperature  PH  ORP value  Dissolved Oxygen  Nitrate  Phosphorus  Ferrous Iron  Total Iron  Sulfate  Hydrogen Sulfide   |

|          |   | MWs with recoverable NAPL located in the area to be impacted by injections/ |
|----------|---|---|
|          |   | amendments  |
| Post-EBR | As needed   |   |
|          |   |   |
| Post-EBR | Quarterly, then<br>frequency amended per<br>modeling and EPA<br>guidance on MNA | Each MW used for injections, amendments, or any analyses                    |
|          |   |   |
|          |   |   |
|          |   |   |
|          |   |   |
|          |   |   |
|          |   |   |

| Compariso                                     | on of NAP   | L compositio   | ons before/  | during/afte  | er EBR to                                |    |
|---|---|--|--|--|--|----|
| •   |   | COC conter   |  |  |  |    |
| - ·   |   |  | P. L.  |  |  |    |
| benzene o<br>Modeling<br>geochemi<br>paramete | oncentrat<br>and analy<br>cal (e.g., s<br>rs that sup | rement of re<br>ion reduction<br>ses of field of<br>ulfate) and re<br>oport hydroc | ons in <u>LNAP</u><br>data should<br>microbial di<br>carbon mine | L and groun<br>also incorp<br>ata (e.g., bi<br>eralization | ndwater.<br>porate<br>omass)<br>by       | ea |
| mechanisi<br>of LNAPL o<br>other hydi         | ms). Mode<br>constituen<br>rocarbon c                 | hanisms (se<br>eling needs<br>its so that th<br>concentratic<br>queous-pha         | to evaluate<br>le extent to<br>on reduction                      | rate-limite<br>which ben<br>as in groun                    | ed dissolution<br>zene and<br>dwater are |    |
| calculation                                   | ns in "Figu   | res" tab). Si<br>iusly documi  |  | ability of re  | uld also be<br>emediation                |    |
|   |   | ction of EBR   | parameter  | s.   |  |    |
|   |   |  | parameter  | s.   |  |    |
|   |   |  | parameter  | S  |  |    |
|   |   |  | parameter  | s.   |  |    |
|   |   |  | parameter  | S.   |  |    |
|   |   |  | parameter  | S.   |  |    |

| Update based on additional field data  |
|--|
| Measurements of NAPL content, specifically benzene mole fraction, are a primary parameter for assessing EBR performance. See the "Figures" tab for example plots of benzene mole fraction. Refer to other comments in "modeling" sections of this table.   |
|  |
| When compared to this baseline data, this information will help monitor sulfate migration outside of the COC areas   |
|  |
| The EBR modeling efforts conducted by the AF, while perhaps useful from an operational standpoint, do not provide a sufficiently extensive and detailed evaluation of important factors determining the efficacy and rate of COC biodegradation, and depletion of COCs from the LNAPL source materials. For instance, the AF EBR modeling efforts assume instantaneous mass transfer of COCs from the LNAPL to groundwater, which likely significantly over-estimates actual rates of transfer of COCs, therefore leading to over-estimates of COC depletion from the LNAPL. In addition, the AF EBR modeling efforts assumed site-wide uniformity of critical parameters (such as porosity) [< They actually did use several different permeability zones in their model; I think we can leave this sentence out]. AF did not provide sensitivity analyses for evaluating the effect of these assumptions on remedial efficacy and timeframe scenarios. Therefore, the Regulatory Team has performed a detailed and extensive analysis and modeling effort to better capture the variability of physical, chemical and biological conditions across the site, and to show the range and likelihood of possible remedial efficacy and timeframe outcomes of EBR and MNA [ST12 Joint agency EBR model cover letter.pdf; TOR Estimates_ST012_052217.pdf; BIONAPL_Box_Model_revised_04-27-2017_UWBZ.xls]. |
| Pope, Daniel F., Steven D. Acree, Herbert Levine, Stephen Mangion, Jeffrey van Ee, Kelly Hurt, Barbara Wilson, Performance Monitoring of MNA Remedies for VOCs in Ground Water EPA/600/R-04/027, National Risk Management Research Laboratory Office Of Research And Development U.S. Environmental Protection Agency, Ada OK, 2004  |
|  |
| Reported on AF flowchart as Eh   |
|  |
|  |
| AF decision flowchart only mentions "Iron" as an analyte, without differentiating which iron species will be monitored   |
|  |
| AF decision flowchart only mentions "Iron" as an analyte, without differentiating which iron species will be monitored   |
|  |
|  |

| Methane        |    |
|----------------|----|
| Alkalinity     |    |
| TPH (DRO, GRO) | Υ  |
| VOCs           | Υ  |
| Arsenic        | ., |

# **Indigenous Microbial Population**

| Total size   |   |
|--|---|
| Major groups within population, and their proportion of total                              |   |
| Total size of sulfate-reducing bacteria population   | Υ |
| Total size of benzene-degrading bacteria population  | Υ |
| In-situ benzene degradation rate   |   |
| Amount of benzene converted to biomass during stable isotope study                         | Υ |
| Amount of benzene converted to carbon dioxide during stable isotope study                  | Υ |
| The overall health of the indigenous microbial population, as determined via PLFA analyses |   |
| The dominant electron-accepting  |   |
| process for indigenous microbial   |   |
| population, and reason for the   |   |
| conclusion   |   |

| Post-EBR | Once, within 3 months<br>of the last injection/<br>amendment | Samplers should be placed so as to most the core of sulfate injections, its periph and downgradient.  All three zones should be monitored.  The same wells should be monitored present the same wells should be monitored present the same wells. |  |
|----------|--|---|--|
|          |  |   |  |
|          |  |   |  |
|          |  |   |  |
|          |  |   |  |

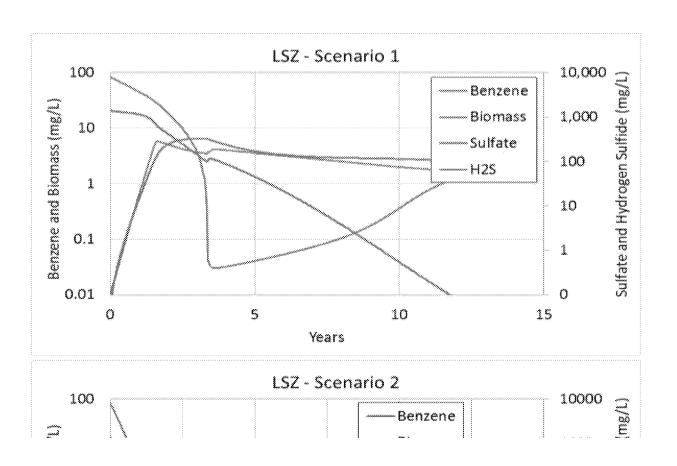
| s will quantify the s<br>crobial community<br>for MNA |  |
|---|--|
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |

| All items other than the last metric, and using qPCR to determine the size of the sulfate-reducing population, are included as part of the already-proposed standard stable-isotope probe (SIP; Bio-Trap) study listed on the AF decision flowchart, but are not included in the metrics to be reported. All of these data are key to fully understanding the makeup, activities, and health of the indigenous microbial population. |                |  |                 |              |                |               | ecision    |     |
|--|----------------|--|-----------------|--------------|----------------|---------------|------------|-----|
| These samplers canr<br>probes would be ant   |                |  |                 |              |                |               |            |     |
|  |                |  |                 |              |                |               |            |     |
|  |                |  |                 |              |                |               |            |     |
| AF decision flowchar<br>Unclear as to what ":<br>study.  |                |  | _               |              | _              |               |            | 8   |
| Unclear as to what "   |                |  | _               |              | _              |               |            | 8   |
| Unclear as to what "   |                |  | _               |              | _              |               |            | 8   |
| Unclear as to what "   | SRB" gene is b |  | l in flowchart. | qPCR perform | med in additio | on to the sta | able-isoto | ope |

Example calculations based on scenarios described in "Time of Remediation Estimates, Enhanced Bioremediation at ST01 Calculation input is provided in Tables 8-10 of the TOR memorandum

Table 8. Parameters for Monod Kinetics

| Parameter                                       |       | UWBZ      | ŁSZ       | Reference            |
|---|-------|-----------|-----------|----------------------|
| Vsoii   | γd^3  | 122,556   | 38,500    | Table 2              |
| Q   | gpm   | 4.4       | 3.5       | Table 2              |
| Knapl   | 1/day | 0.05      | 0.05      | Mobile et al. (2016) |
| C <sup>02</sup> (backgmd)                       | mg/L  | 7.0       | 7.0       | Table M.4.3.2.1      |
| C <sup>NO3-</sup> (backgrnd)                    | mg/L  | 8.0       | 8.0       | Table M.4.3.2.1      |
| C <sup>504-</sup> (backgrnd)                    | mg/L  | 200       | 290       | Table M.4.3.2.1      |
| <sub>?/</sub> 504-                              | g/g   | 4         | 4         | Table M.4.3.5.3      |
| v max<br>Benzene,50}-                           | 1/day | 0.000875  | 0.0175    | Table M.4.3.5.1/2    |
| ymax<br>Toluene,504                             | 1/day | 0.001125  | 0.0225    | Table M.4.3.5.1/2    |
| Vmax<br>Ethylbenzene,502                        | 1/day | 0.000875  | 0.0175    | Table M.4.3.5.1/2    |
| vmax<br>Vvienes so <sup>2</sup> -               | 1/day | 0.001125  | 0.0225    | Table M.4.3.5.1/2    |
| V <sup>max</sup><br>Naphthalene,50 <sup>2</sup> | 1/day | 0.000125  | 0.0025    | Table M.4.3.5.1/2    |
| ymax<br>TMB.SO <sub>4</sub>                     | 1/day | 0.000125  | 0.00125   | Table M.4.3.5.1/2    |
| ymax<br>Other Aromatics,50                      | 1/day | 0.000625  | 0.0125    | Table M.4.3.5.1/2    |
| $K_{SO_4^{2-}}$                                 | mg/L  | 1         | 1         | Table M.4.3.5.3      |
| K-503-  | mg/L  | 5         | 5         | Table M.4.3.5.3      |
| Y   | g/g   | 0.2       | 0.2       | BEM (2007)           |
| Msee,o (initial)                                | mg/L  | 0.01      | 0.01      | BEM (2007)           |
| ld.bk<br>Lseb                                   | 1/day | 0.001/0.0 | 0.001/0.0 | BEM (2007)           |



| Takain. | <b>C3</b> | lexitical | EDD. |
|---------|-----------|-----------|------|

|                |                  | `_ |
|----------------|------------------|----|
| Aquifer Zone   |                  | 4  |
|                |                  | 1  |
|                |                  | F  |
| UWBZ           | NAPL (gal)       |    |
| V = 122,556 cy | Sulfate (kg) =   |    |
|                | Sulfate (mg/L) = |    |
| LSZ            | NAPL (gal)       |    |
| V = 38,500 cy  | Sulfate (kg) =   |    |
|                | Sulfate (mg/L) = |    |

Table 10. TOR for NAPL Deple

| ianie io, ion ioi imerrochie |         |          |       |  |  |  |
|------------------------------|---------|----------|-------|--|--|--|
| Aquifer                      | Ambient | Mass     | Calci |  |  |  |
| Zone                         | Flow    | Transfer | Targe |  |  |  |
|                              |         | Coeff.   | Vol   |  |  |  |
|                              |         |          | Poros |  |  |  |
|                              | gpm     | day¹     | yε    |  |  |  |
| UWBZ                         | 4.4     | 0.0042   | 1     |  |  |  |
| UW8Z                         | 4.4     | 0.05     | ķ     |  |  |  |
| UW8Z                         | 0.0*    | 0.05     | 1     |  |  |  |
| LSZ                          | 3.5     | 0.0042   | 5     |  |  |  |
| LSZ                          | 3.5     | 0.05     | 1     |  |  |  |
| LSZ                          | 0.0*    | 0.05     | 1:    |  |  |  |

Targeted Sulfate Mass and Concentration

| ingered surface mass and concerniation |              |              |              |  |  |  |  |
|--|--------------|--------------|--------------|--|--|--|--|
| Calculated^                            | Calculated^  | Literature*  | Literature*  |  |  |  |  |
| Γarget NAPL                            | Target NAPL  | Target NAPL  | Target NAPL  |  |  |  |  |
| Volume                                 | Volume       | Volume       | Volume       |  |  |  |  |
| Porosity=0.3                           | Parasity=0.4 | Porosity=0.3 | Porosity=0.4 |  |  |  |  |
| gal                                    | gal          | gal          | gal          |  |  |  |  |
| 250,999                                | 215,142      | 294,399      | 395,887      |  |  |  |  |
| 1,032,067                              | 884,629      | 1,210,521    | 1,627,823    |  |  |  |  |
| 36,715                                 | 23,603       | 43,064       | 43,432       |  |  |  |  |
| 54,821                                 | 46,989       | 110,682      | 155,783      |  |  |  |  |
| 225,415                                | 193,211      | 455,106      | 640,554      |  |  |  |  |
| 25,527                                 | 16,410       | 51,538       | 54,404       |  |  |  |  |



| Total and the second of the second se |              |              |              |       |  |  |
|--|--------------|--------------|--------------|-------|--|--|
| ulated   | Calculated   | Literature   | Literature   | Notes |  |  |
| t NAPL   | Target NAPL  | Target NAPL  | Target NAPL  |       |  |  |
| lume   | Volume       | Volume       | Volume       |       |  |  |
| :ity=0.3   | Porosity=0.4 | Porosity=0.3 | Porosity=0.4 |       |  |  |
| ears   | years        | years        | years        |       |  |  |
| :33  | 111          | 152          | 178          | 1     |  |  |
| 92   | 84           | 102          | 126          | ***   |  |  |
| .26  | 116          | 140          | 174          | 2     |  |  |
| 2.4 🕖  | 36.2         | 104          | 116          | 3     |  |  |
| 3.2  | 9.4          | 28.0         | 36.1         | В     |  |  |
| 2.1  | 9.9          | 22.0         | 27.0         | 4     |  |  |

